

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

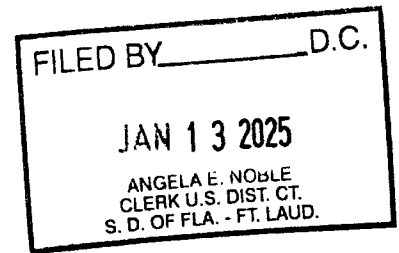
CASE NO. 25-6012-MJ-STRAUSS

UNITED STATES OF AMERICA

v.

K'SHAWN ALEXIS FREDERICKS,

Defendant.



CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek M. Maynard)? **No**
2. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared M. Strauss)? **No**
3. Did this matter involve the participation of or consultation with now Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? **No**
4. Did this matter involve the participation of or consultation now Magistrate Judge Marta Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? **No**

Respectfully submitted,

MARKENZY LAPOINTE
UNITED STATES ATTORNEY

By: Adam Love
ADAM LOVE
Assistant United States Attorney
United States Attorney's Office – SDFL
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AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

United States of America

v.

K'Shawn Alexis Fredericks

Case No.

25-6012-MJ-STRAUSS

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 12, 2025 in the county of Broward in the
Southern District of Florida, the defendant(s) violated:

Code Section

Offense Description

21 U.S.C. § 963

Conspiracy to Import a Controlled Substance

21 U.S.C. § 952(a)

Importation of a Controlled Substance

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.



Complainant's signature

Special Agent Mark Vallone, HSI

Printed name and title

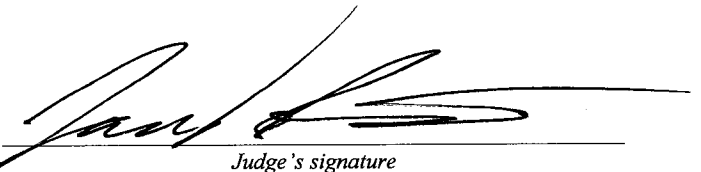
Sworn to before me and signed in my presence.

Date:

January 13, 2024

City and state:

+ JMS
Ford Lauderdale, Florida



Judge's signature

Honorable Jared M. Strauss, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Mark Vallone, having been duly sworn, hereby depose and say:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Department of Homeland Security, United States Immigration and Customs Enforcement, Homeland Security Investigations (“HSI”) in Fort Lauderdale, Florida, and have been so employed since 2018. I am classified, trained, and employed as a federal law enforcement officer with statutory arrest authority and charged with conducting criminal investigations of alleged violations of federal criminal statutes, including Title 8, Title 18, and Title 21 of the United States Code. I am a “federal law enforcement officer” as defined by Rule 41(a)(2)(C) of the Federal Rules of Criminal Procedure.

2. I have received specialized training concerning drug smuggling and have been personally involved in drug smuggling investigations. I have participated in various aspects of human smuggling, drug trafficking, and firearms investigations including physical surveillance, execution of search and arrest warrants, undercover operations/recordings, witness interviews, electronic monitoring, the use of confidential informants, and the analysis of phone and financial records. I am also familiar with the various methods generally utilized by traffickers to transport narcotics into the United States from other countries.

3. The information contained in this affidavit is based on my own personal knowledge and my review of documents and records gathered during this investigation, as well as information obtained, directly or indirectly, from other sources and agents, including information provided to me by other agents and officers who are involved in the investigation. I have not included in this Affidavit each fact and circumstance known to me, but only the facts that I believe establish probable cause to support a criminal complaint against K’Shawn Alexis Fredericks for Conspiracy

to Import Cocaine, a Controlled Substance in violation of 21 U.S.C. § 963, and Importation of Cocaine, a Controlled Substance, in violation of 21 U.S.C. § 952.

PROBABLE CAUSE

4. On or about January 12, 2025, at approximately 2:00 p.m., K'Shawn Alexis Fredericks ("FREDERICKS"), arrived at the Fort Lauderdale/Hollywood International Airport (FLL) on board Spirit Airlines Flight# 895 from St. Thomas, U.S. Virgin Islands.

5. U.S. Customs and Border Protection (CBP) were on the flightline conducting customs examinations and searches of baggage unloaded from Spirit Airlines Flight# 895 by airport employees. One of the bags unloaded from the aircraft was a blue duffel bag. CBP searched the blue duffel bag and found approximately three (3) bricks of a white powdery substance. CBP also observed approximately \$2,000.00 inside of the bag and a Spirit Airlines bag tag affixed to the blue duffel bag displaying the name "FREDERICKS/K'S".

6. CBP removed the white powdery substance, placed the blue duffel bag onto the baggage belt, and monitored the baggage belt claim area. CBP observed a male, later determined to be FREDERICKS, retrieve the blue duffel bag from the baggage belt. The male was detained and escorted to a secure location holding room.

7. The white powdery substance field-tested positive for the presence of cocaine. The total weight of the seized cocaine was approximately 3.8 kilograms (kg).

8. I conducted a custodial interview of the male in the English language, which was recorded with audio and video. Based on the identification documents presented to me and the statements made, I determined the individual to be FREDERICKS. Prior to the start of questioning, FREDERICKS was informed of his *Miranda* rights from a preprinted form. FREDERICKS agreed

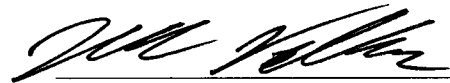
to waive his right to remain silent and to answer questions from law enforcement about the incident without counsel present.

9. During the interview, FREDERICKS stated, in sum and substance, that he received direction and instructions from Co-conspirator 1 to transport what he believed to be an illegal commodity in the blue duffel bag from the U.S. Virgin Islands to Broward County, Florida. In exchange, FREDERICKS was to be paid \$3,000 dollars.

CONCLUSION

10. I respectfully submit that there is probable cause to believe that on or about January 12, 2025, in Broward County, in the Southern District of Florida, FREDERICKS did violate Conspiracy to Import Cocaine, a Controlled Substance in violation of 21 U.S.C. § 963, and Importation of Cocaine, a Controlled Substance, in violation of 21 U.S.C. § 952..

FURTHER AFFIANT SAYETH NAUGHT.



MARK VALLONE
Special Agent
Homeland Security Investigations

Sworn to and subscribed before me
on this 13th day of January 2025.



HONORABLE JARED M. STRAUSS
UNITED STATES MAGISTRATE JUDGE

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NUMBER: 25-6012-MJ-STRAUSS

BOND RECOMMENDATION

DEFENDANT: K'SHAWN ALEXIS FREDERICKS

PTD

(Personal Surety) (Corporate Surety) (Cash) (Pre-Trial Detention)

By: 

AUSA: ADAM LOVE

Last Known Address: 9-AB Constitutional Hill

Christiansted, VI

What Facility:

Agent(s):

MARK VALLONE, HSI

(FBI) (SECRET SERVICE) (DEA) (IRS) (ICE) (**OTHER**)